

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Shenzhen Liqiu Sanhou Technology Co., Ltd

Plaintiff,

v.

Xiaoling Che,

Defendant.

CASE NO. 24-cv-11980

Judge Andrea R. Wood

Magistrate Judge Heather K. McShain

DECLARATION OF XIAOHE HUANG

I, Xiaohe Huang, hereby declare as follows:

1. I am the manager of Plaintiff Shenzhen Liqiu Sanhou Technology Co., Ltd. I am fully familiar with all of the facts and circumstances herein and have actual knowledge of the events from which these claims have arisen.

2. I am also fully familiar with the operation of Plaintiff's Amazon store "Sanhou-SH".

3. I have authority to make this Declaration on behalf of the Plaintiff. My declaration is based on my personal knowledge of records, emails, and documents kept in the ordinary course of Plaintiff's business.

4. I provide this Declaration to refute Defendant's misleading statements and to do my utmost to save my store.

5. As I stated in my previous declaration, the old design was discontinued in September 2024, and I have exclusively been selling the new design since October 2024. In

addition to selling the new design, I updated the photos on my Amazon listings to reflect the new design. Below is an example of one of the updated photos displayed on my Amazon pages for ASINs B0CQSZMJBS and B0C7QFLV8L. This photo clearly depicts the design of the support unit, which is evidently non-infringing of the '551 Patent. A screenshot that was taken before the take-down of ASIN B0C7QFLV8L is attached as Exhibit 1.






Innovative Rotating Design

Easy installation and removal with no tools



6. Therefore, it is impossible that, when the Defendant filed its patent infringement complaint against my store on November 12, 2024, the Defendant was unaware that I was selling the clearly non-infringing new design.

7. Regarding the ASIN repeatedly mentioned by Plaintiff in its opposition and declaration, B0DH3D7PW1, the first sale of this ASIN occurred on 11/12/2024. It is for a 1,000-piece puzzle board, which is distinct from the 1,500-piece puzzle board sold under the two delisted ASINs.

Fulfillment method: Amazon Sales channel: Amazon.com Seller order ID: 113-9738717-2016229		SKU: SH-PTZBC-S-US Quantity: 1 Item subtotal: US\$69.99	
<input type="checkbox"/> 2 weeks ago 11/13/2024 12:30 PM PST	112-1724472-4193868 Buyer name: Ashley Fulfillment method: Amazon Sales channel: Amazon.com Seller order ID: 112-1724472-4193868	 Playboda 1000 Pieces Rotating Plastic Puzzle Board with Drawers and Cover, 30"x22" Portable Jigsaw Puzzle Table for Adults, Lazy Susan Spinning Puzzle ASIN: B0DH3D7PW1 SKU: SH-PTZBC-S-US Quantity: 1 Item subtotal: US\$69.99	Expedited Payment complete
<input type="checkbox"/> 2 weeks ago 11/13/2024 9:45 AM PST	114-7588188-8545840 Fulfillment method: Amazon Sales channel: Amazon.com Seller order ID: 114-7588188-8545840	 Playboda 1000 Pieces Rotating Plastic Puzzle Board with Drawers and Cover, 30"x22" Portable Jigsaw Puzzle Table for Adults, Lazy Susan Spinning Puzzle ASIN: B0DH3D7PW1 SKU: SH-PTZBC-S-US Quantity: 1 Item subtotal: US\$0.00	Expedited Payment complete
<input type="checkbox"/> 2 weeks ago 11/12/2024 11:07 AM PST	112-3014134-0667429 Fulfillment method: Amazon Sales channel: Amazon.com Seller order ID: 112-3014134-0667429	 Playboda 1000 Pieces Rotating Plastic Puzzle Board with Drawers and Cover, 30"x22" Portable Jigsaw Puzzle Table for Adults, Lazy Susan Spinning Puzzle ASIN: B0DH3D7PW1 SKU: SH-PTZBC-S-US Quantity: 1 Item subtotal: US\$0.00	Expedited Payment complete

Showing orders 1 - 22 of 22 total orders.

8. Before the 11/14/2024 takedown, my store had only 3 selling ASINs: two were the delisted ASINs, and one sold a metal CD shelf. These 3 ASINs contributed \$3 million in annual sales, with the two delisted ASINs accounting for nearly 99% of that sales volume. Now, the two delisted ASINs' sales volume has dropped to zero. Dividing \$3 million by 365 days, my average daily sales were over \$8,000. Thus, the Defendant's accusation that I have been dishonest in my declaration is a reckless and malicious defamation.

Date		Sales breakdown	Fulfillment channel	
Custom		Marketplace total	Both (Amazon and seller)	
11/1/2023	11/1/2024		Apply	

Sales Snapshot taken at 11/24/2024, 10:52:26 PM PST

Total order items	Units ordered	Ordered product sales	Avg. units/order item	Avg. sales/order item
45,818	46,784	\$3,052,968.00	1.02	\$66.63

Compare Sales

9. It is impossible to move the products under the restrained ASIN to an unrestrained ASIN and continue selling. Third, it is impossible to move the products under the restrained ASINs to an unrestrained ASIN and continue selling. Amazon's system is very strict in managing inventory; every product entering the warehouse is tied to a specific ASIN. If an ASIN is frozen, the seller cannot move inventory to another ASIN through the seller center. This Court has heard thousands of Schedule A cases, and it is clear that a TRO entered against an ASIN can effectively freeze both the ASIN and its corresponding inventory.

10. From 11/14/2024 till today, I have lost at least 96,000 sales, lost all my market share and missed the black Friday sales. The Defendant is an individual hiding in China and has no tangible assets in the United States. Plaintiff operates an Amazon store with annual sales of \$3 million, but the Defendant has now destroyed Plaintiff's store. If Plaintiff ultimately wins, Plaintiff does not even know the Defendant's name (The Defendant's name is "Xiaoling Che" in Pinyin, and there are hundreds of possible Chinese character combinations that correspond to this Pinyin) or address, making it impossible to enforce any judgment.

11. I am ready to litigate this case, but I need the Court's help to keep my business alive.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 27, 2024

Name Xiao he Huang